

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

IN RE:	§	CASE NO. 08-61245
	§	
JASON SHAWN BOWMAN	§	
AND ANDREA RAE BOWMAN	§	
	§	
DEBTORS	§	CHAPTER 13

MOTION FOR MORATORIUM

TO THE HONORABLE FRANK R. MONROE, UNITED STATES BANKRUPTCY
JUDGE FOR THE WESTERN DISTRICT OF TEXAS, WACO DIVISION:

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTEREST:**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY(20) DAYS
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN
MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

NOW COMES Jason Shawn Bowman and Andrea Rae Bowman, the Debtors in
the above referenced bankruptcy case (the "Debtors"), and files this their Motion for
Moratorium (the "Motion"), and in support thereof would respectfully show unto this
Honorable Court as follows:

1. Jason Shawn Bowman and Andrea Rae Bowman have filed a voluntary
petition under Chapter 13 of the United States Bankruptcy Code. Ray Hendren has been
appointed as the Trustee in this case.

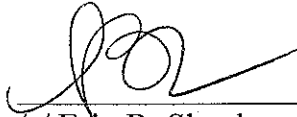
2. The Debtors plan is set for confirmation on February 10, 2009. Mr. Bowman

left for Iraq in January of 2009. Their bankruptcy plan payments were based on his increased income received while he was in Iraq. The undersigned attorney obtained a "pay order" and served DFAS (the military payroll service) with that pay order. However, the military did not remove his Chapter 13 plan payment from his pay check in December. It was removed by the military and sent to the Trustee on January 31, 2009. Since he was not in Iraq and was not receiving the additional income that the plan was based on, the Bowmans did not have enough money to support their family and make their plan payments. This was especially true because it was Christmastime and the Bowmans have two children and he had the extra expenses of preparing to deploy.

3. Additionally, Mr. Bowman is paid once a month at the end of the month. The Trustee is asserting that their February 2009 payment is due prior to the February 10th confirmation and will not recommend confirmation unless two payments are made prior to February 10th. Although the undersigned attorney believes that the February plan payment is not due until February 19th, the Debtors are also requesting a moratorium so that their plan payments are due on the 30th of the month, commencing January 2009 and the missed December 2008 payment is spread over the life of their Chapter 13 Plan.

WHEREFORE, PREMISES CONSIDERED, Jason Shawn Bowman and Andrea Rae Bowman hereby respectfully request this Court to grant them a moratorium as requested above and for such other and further relief as is just.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'ES' with a long horizontal stroke extending to the right.

/s/ Erin B. Shank

State Bar No. 01572900

/s/ Samantha Kehl

State Bar No. 24062821

ERIN B. SHANK, P.C.

1902 Austin Avenue

Waco, TX 76701

Telephone: (254) 296-1161

Telecopier: (254) 296-1165

ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I certify that on February 4, 2009 a correct copy of the above and foregoing was served (without attached matrix) upon the following parties via electronic means as listed on the court's ECF noticing system or by regular first class mail:

Ray Hendren
Chapter 13 Trustee
Via Electronic Mailing
8310 Capital of Texas Hwy North
Suite 475
Austin, TX 78735

Mr. and Ms. Bowman
2508 Jake Drive
Coperas Cove, TX 76522

All creditors listed on Matrix attached hereto as Exhibit "A"



/s/Erin B. Shank

Label Matrix for local noticing

0542-6

Case 08-61245-fm

Western District of Texas

Waco

Wed Feb 4 10:27:35 CST 2009

(p)APPLIED BANK

PO BOX 15809

WILMINGTON DE 19850-5809

U.S. BANKRUPTCY COURT

800 FRANKLIN AVE., SUITE 140

WACO, TX 76701-1934

Allstate

Duke Vogel

3210 Prosperity Chrc

Charlotte, NC 28269-8193

Chase

P.O. Box 100511

Florence, SC 29502-0511

Clayton, Myrick, McClanahan, & Coulter,

P.O. Box 929

Durham, NC 27702-0929

County of Coryell

c/o Lee Gordon

P.O. Box 1269

Round Rock, TX 78680-1269

Equifax

P.O. Box 6190144

Dallas, TX 75251-904

Erin B. Shank, P.C.

2309 Austin Avenue

Waco, Texas 76701-1508

Experian

Profile Maintenance

P.O. Box 9558

Allen, TX 75013-9558

First Financial Asset Management

P.O. Box 18064

Hauppauge, NY 11788-8864

First Financial Asset Management

P.O.Box 6887

Miramar Beach, FL 32550-1006

First Premier Bank

601 S. Minnesota Ave.

Sioux Falls, SD 57104-4868

GC Services

6330 Gulfton

Houston, TX 77081-1198

GMAC

PO Box 130424

Roseville, MN 55113-0004

GMAC

PO Box 380902

Bloomington MN 55438-0902

Gym X

3301 E Rancier, Suite 111

Killeen, TX 76543-7805

HSBC AUTO FINANCE

PO BOX 829009

Dallas, TX 75382-9009

HSBC Auto

6602 Convoy Court

San Diego, CA 92111-1009

HSBC Auto Finance

P.O. Box 17904

San Diego, CA 92177-7904

I.C. System, Inc.

444 Highway 96 East

P.O. Box 64437

St. Paul, MN 55164-0437

IDT Carmel, Inc.

2080 Elm St SE

Minneapolis, TX 55414-2531

Internal Credit Systems, Inc.

5504 Durham Chapel Hill Blvd, St 200

Durham, NC 27707-3343

Interstate Credit Collections

711 Coliseum Plaza Court

Winston Salem, NC 27106-5300

JPMorgan Chase Bank, National Association

Mail Stop: JAXB2007

7255 Baymeadows Way

Jacksonville, FL 32256-6851

Nations Recovery Cetner, inc.

6491 Recovery Industrial Blvd.

Atlanta, GA 30360

Ocwen Federal Bank FSB

P.O.Box 785058

Orlando, FL 32878-5058

Ocwen Loan Servicing

Attn: Cashiering Department

P.O. Box 785053

Orlando, FL 32878-5053

Orchard Bank

P.O. Box 17051

Baltimore, MD 21297-1051

People First Recoveries

P.O. Box 1259

Oaks, PA 19456-1259

Premier Bankcard/Charter
P.O. Box 2208
Vacaville, CA 95696-8208

Roberts & Roberts LLP
2501 E Elms Road
Killeen, TX 76542-3023

Trans Union Corporation
Attn: Public Records Dept.
555 West Adams Street
Chicago, IL 60661-3631

United States Trustee - WA12
United States Trustee
903 San Jacinto Blvd, Suite 230
Austin, TX 78701-2450

Van Ru Credit Corp
8550 Ulmerton Rd. Suite 225
Largo, FL 33771-5351

Washington Mutual Bank
P.O. Box 1093
Mail Stop N01 38
Northridge, CA 91328

Windcrest Nursing Center
607 West Avenue B
Copperas Cove, TX 76522-1599

Andrea Rae Bowman
2508 Jake Drive
Copperas Cove, TX 76522-7525

Erin B. Shank
Erin B. Shank, P.C.
1902 Austin Avenue
Waco, TX 76701-1619

G. Ray Hendren
8310 Capital of Texas Hwy North
Ste. 475
Austin, TX 78731-1081

Jason Shawn Bowman
2508 Jake Drive
Copperas Cove, TX 76522-7525

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Applied Bank
601 Delaware Ave
Wilmington, DE 19801

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Ch Med Col
Fact Act
Suppression,

(d) GMAC
PO Box 130424
Roseville, MN 55113-0004

End of Label Matrix	
Mailable recipients	40
Bypassed recipients	2
Total	42